

EXHIBIT C

MARTHA BOERSCH (CABN 126569)
Attorney for the United States
Acting Pursuant to 28 U.S.C. § 515

MARTHA BOERSCH (CABN 126569)
Chief, Criminal Division

NIKHIL BHAGAT (CABN 279892)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7193
FAX: (415) 436-6982
nikhil.bhagat@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 23-471 WHO
)	
Plaintiff,)	DECLARATION OF ALEJANDRO MARTI
)	MINGUEZ
v.)	
)	
KEITH LATTERI,)	
)	
Defendant.)	
)	

Pursuant to 18 U.S.C. § 1746, I declare the following:

1. My name is Alejandro Marti Minguez. I am currently employed as an Investigator on the Global Security Investigations team at the company identified in the Indictment in the above-captioned Indictment as COMPANY A.

2. I am familiar with the 2018-2019 intrusion into a COMPANY A subcontractor (identified in the Indictment as COMPANY B) by defendants Noah Roskin-Frazee and Keith Latteri. I know that this intrusion allowed the defendants and others to gain access to COMPANY A systems and obtain COMPANY A merchandise.

3. I have personally continuously worked on this investigation since at least April 2019.

4. As a result of this intrusion, COMPANY A has spent \$506,694.98 to remediate its own systems and networks, by contracting with the outside vendors CrowdStrike and BishopFox.

5. Additionally, a total of 10 COMPANY A employees have spent a total of 2479.5 hours investigating and responding to the intrusion. Based on a calculation of those individuals' hourly salary, I believe that investigation has cost COMPANY A \$151,094.60.

6. In total, COMPANY A has expended at least \$657,789.58 as a result of the intrusion in this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 24, 2025 at Cupertino, California.

/s/ Alejandro Marti Minguez
ALEJANDRO MARTI MINGUEZ